**From:** "John Maxwell (New Jersey)" <*omitted*>
**To:** <airworkgroupvoc@dep.state.nj.us>, <*omitted*>, <*omitted*>, <airworkgroup@dep.state.nj.us>
**Date:** 7/24/2006 11:33:31 AM
**Subject:** VOC Comments - kindly add to formal comments

VOC Comments from the New Jersey Petroleum Council

September 30, 2005
Re: Volatile Organic Compounds from Processes and Consumer Products Workgroup:
VOC-005 - New membrane technology to control VOCs from gasoline retail tanks.
Via e-mail to: Bob Heil, NJDEP *omitted*.
airworkgroupvoc@dep.state.nj.us

The New Jersey Petroleum Council (NJPC) is aware of the efforts of a workgroup made up of interested parties to develop recommendations of potential ways to control and/or reduce VOC emissions from various chemical products and/or processes. The NJPC further understands that the topics considered by this workgroup included consumer products as well as industrial processes. Among the control measures being considered are additional vapor controls on gasoline dispensing facilities or, more specifically, retail gasoline outlets.

The NJPC has concerns regarding the listing of what is a relatively new vapor processing technology using semi-permeable membranes to control VOCs from retail gasoline vent lines (VOC-005).

1. There is one membrane vapor processor currently certified by CARB for purposes of making one existing vac-assist vapor recovery system compatible with vehicle-based on-board refueling vapor recovery (ORVR) systems. There is at least one other membrane technology that may eventually compete with this single certified system once it also gains certification.

These processors were both developed to handle the small amounts of emissions that may result from refueling ORVR vehicles at vac-assist gasoline dispensing facilities. The alleged ORVR incompatibility is most often attributed to the interaction of some vacuum assist systems and ORVR equipped vehicles. API has done work that shows that much of the incompatibility can be eliminated by making simple adjustments to these systems.

2. ORVR is a competing vapor recovery technology at retail gasoline outlets. The USEPA is in the process of defining ORVR "widespread use"

for purposes of eventually phasing out redundant Stage II vapor recovery programs. API supports the USEPA's efforts and is advocating that the existing ORVR program, when it is determined to be in "widespread use", will allow the phase out of Stage II vapor control systems in individual nonattainment areas. API's analysis shows that widespread use, depending on the definition and the particular nonattainment area, is likely to fall between 2009 and 2012.

3. The membrane vapor processor technology is fairly fresh out of the box from CARB certification (November 2004). The device does not have much real world use; thus, at this point in time it is difficult to physically place the device in many existing facilities and because of the lack of experience with the equipment it is difficult to determine how it will perform in the field. The membrane vapor processor system has been just recently certified by CARB (November 2004) and, consequently, there is not much real-world experience regarding its effectiveness and durability. It is also worth noting that because of certain fire code requirements and lot size limitations, some facilities will have difficulty locating the processor on their site.

4. NH & MD have been eying the membrane vapor processor as a possible solution to perceived subsurface gasoline vapor situations. This is a relatively new matter that is currently under discussion in several circles. API and the USEPA are working to quantify and better understand these small releases as they pertain to potential groundwater contamination.

5. The stated initial capital expense for membrane vapor processor system is between $30,000 and $50,000. This is a significant investment for any retail gasoline outlet. In California, some major oil companies with vac-assist vapor recovery systems have found it more cost effective to convert those systems to balance in lieu of installing membranes or other add-on devices to become ORVR compatible. Additionally, the table states that "[T]he expense may be too costly for privately owned stations." This statement recognizes that a mandate for this technology could well result in an unlevel playing field.

Tech Environmental recently completed a cost analysis of ORVR-compatible systems for three counties in Florida. One of their conclusions was that for a capital cost of $20,000, the control cost increased above $10,000 per ton of VOC reduced by 2009 (see attached report).

API members support more diligent enforcement of the existing Stage I and II vapor recovery programs, particularly those efforts aimed at improved inspections and maintenance. Such a program is the most effective and economical way to reduce VOCs from gasoline dispensing

facilities.

We hope that these comments are helpful. We are in support of cleaner air and are doing our part by bringing cleaner fuels to the marketplace. We are skeptical, however, concerning the promise of new technologies that have not been thoroughly vetted. Please do not hesitate to call if you have any questions or would like to discuss this further.

Sincerely,

John A. Maxwell
New Jersey Petroleum Council
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*omitted*

**CC:** "White, James S" <*omitted*>, "Moul, Chris L" < *omitted*>, "Okamoto, Mark R" < *omitted* >, "Roddy, Michelle L." < *omitted* >, "Prentiss Searles" < *omitted* >, < *omitted* >